

Attorney list on signature page

E-filed: 8/22/2008

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

RAMBUS, INC.,

Plaintiff.

v.

HYNIX SEMICONDUCTOR INC., HYNIX
SEMICONDUCTOR AMERICA INC., HYNIX
SEMICONDUCTOR MANUFACTURING
AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC.,
SAMSUNG AUSTIN SEMICONDUCTOR,
L.P.,

NANYA TECHNOLOGY CORPORATION,
NANYA TECHNOLOGY CORPORATION
U.S.A.,

Defendants.

RAMBUS, INC.,

Plaintiff.

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC.,
SAMSUNG AUSTIN SEMICONDUCTOR,
L.P.,

Defendants.

Case No. C 05-00334 RMW

~~PROPOSED~~ ORDER REGARDING
PRETRIAL CALENDAR FOR
SEPTEMBER 22, 2008 TRIAL

Case No. C 05-02298 RMW

~~PROPOSED~~ ORDER REGARDING PRETRIAL CALENDAR
FOR SEPTEMBER 22, 2008 TRIAL

Case Nos. C 05-00334 RMW, C 05-02298 RMW

Plaintiff and Counterclaim-Defendant Rambus, Inc. (“Rambus”) and Defendants and Counterclaim-Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.P. (collectively “Samsung”) submit this Joint Proposed Pretrial Calendar.

A. Pretrial Schedule

The following schedule reflects the outcome of the Case Management Conference before the Court on June 30, 2008 and the parties’ agreement.

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|--------------------|--|
| August 18 | Expert discovery cut-off, unless extended for particular expert by agreement of the parties |
| | 2:00 p.m.: Lead counsel to meet and confer regarding pretrial conference issues |
| August 27 | Deadline for All Pretrial Submissions Set Forth in Paragraph B of Court’s Standing Order, including: |
| | <ul style="list-style-type: none"> • Trial briefs • Motions in limine, if any • Deposition and written discovery designations • Proposed Findings of Fact and Conclusions of Law • Joint Pretrial Statement • Trial Witness Lists • Exhibit Lists |
| | Deadline for <i>Daubert</i> Motions, if any ¹ |
| September 8 | Deadline for All Pretrial Submissions Set Forth in Paragraph C of Court’s Standing Order, including: |
| | <ul style="list-style-type: none"> • Oppositions to motions <i>in limine</i>, if any |

¹ For any expert depositions taking place after August 18, 2008 (the close of expert discovery), any corresponding *Daubert* or *in limine* motion will be due five business days after the expert’s deposition. The opposition to any such *Daubert* or *in limine* motion will be due five business days after the motion is filed.

- Objections to deposition and written discovery designations & counter-designations
- Objections to Trial Exhibits

Deadline for Opposition to any *Daubert* Motions

September 11 2:00 p.m., Pretrial Conference

September 12 Deadline For Objections To Any Counter-Designations Of Depositions Or Written Discovery And Any Rebuttal Designations

September 16 2:00 p.m., Second Pretrial Conference (if necessary)

September 22 Trial Begins

IT IS SO ORDERED.

Date: 8/22/2008

Ronald M. Whyte

Hon. Ronald M. Whyte

DATED: August 19, 2008

MUNGER, TOLLES & OLSON LLP

By: /s/
Carolyn Hoecker Luedtke

Attorneys for RAMBUS, INC.

DATED: August 19, 2008

WEIL, GOTSHAL & MANGES LLP

By: /s/
David J. Healey

Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., AND SAMSUNG AUSTIN SEMICONDUCTOR, L.P.